

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**NORTH AMERICAN BREEDING BIRD SURVEY
OMB Control Number 1028-0079**

Terms of Clearance: None.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Fish and Wildlife Conservation Act as amended in 1988 requires that the Secretary of the Interior monitor and assess migratory nongame bird populations, determine the effects of environmental changes and human activities, identify birds likely to be candidates for endangered species listing, and identify conservation actions that would prevent listing from being necessary. All these activities assist in fulfilling the Secretary's responsibilities under the Migratory Bird Treaty Act and the Migratory Bird Conservation Act.

Scientists from Federal, State, and local agencies use data from the North American Breeding Bird Survey (BBS) to identify bird populations demonstrating significant declines to direct conservation and research efforts towards those species before their numbers reach critically low levels. The Balanced Budget Downpayment Act authorizes the U.S. Geological Survey to manage the Breeding Bird Survey program.

Migratory Bird Treaty Act (16 U.S.C. §§ 703-712, July 3, 1918, as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986 and 1989)

The Fish and Wildlife Conservation Act (16 U.S.C. §§ 2901-2911, September 29, 1980, as amended 1986, 1988, 1990 and 1992)

The Balanced Budget Downpayment Act, I (110 Stat. 26).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

Respondents record all bird species and numbers of individuals detected during 50 3-minute point counts. These data provide an index of population abundance for over 500 bird species that can be compared through time.

The USGS Eastern Ecological Science Center currently provides BBS population trend estimates and raw population data for more than 500 bird species via the Internet (www.pwrc.usgs.gov/bbs/). These data, along with other indicators, are used by the U.S. Fish and Wildlife Service to assess and set avian species management priorities across the Nation. State governmental agencies also rely heavily on BBS data to regulate wood duck and band-tailed pigeon hunting seasons and to populate State Natural Heritage program databases. In addition, BBS data are used by researchers, educators, and the general public to define research goals and to learn more about avian distributions and population fluctuations. For example, more than 800 scientific papers have relied heavily on BBS data for publication. Information on species detected and number of individuals are recorded at pre-established

locations to allow population trends for each bird species to be calculated through time.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

In 1997, the BBS switched from an entirely paper driven process to a combination of paper and electronic processes whereby participants may, and are encouraged, to submit their data via the Internet. Currently, approximately 85 percent of the annual data are submitted electronically via the web. All other data are submitted on paper forms, the data from which are entered into the BBS database by seasonal staff. Data, trend estimates, and other information regarding the BBS are disseminated via the BBS Internet site.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

No other organization gathers this type of avian population information in the scientifically rigorous manner and scale of the North American Breeding Bird Survey (BBS). The Christmas Bird Count, eBird, and the Integrated Monitoring of Bird Conservation Regions are the most similar programs. The former two lack the scientific sampling design of the BBS and eBird does not have the historical depth of BBS. Also, the Christmas Bird Count samples winter populations, which reduces the utility of their data. The IMBCR program only samples a portion of the western states. Numerous other national avian monitoring initiatives (i.e., Monitoring Avian Productivity and Survivorship, Colonial Waterbird Monitoring, Marsh Bird Monitoring) have also been established; they are designed to complement the BBS rather than duplicate its efforts by focusing on species that are currently not well monitored by the BBS sampling methodology.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information does not affect small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Across the nation, BBS data are critical to the functions of Federal and State Wildlife Agencies, Flyway Councils, and non-governmental organizations. These data help resource managers meet their mandates to reduce conflicts between birds and people, identify species of greatest conservation need, and set healthy harvest levels. Private sector industries have adopted science-based, sustainable practices driven by BBS data that benefit both their own operations and birds. Not collecting this information would leave the Secretary of the Interior and other federal and state government agencies unable to make informed decisions when implementing the Migratory Bird Treaty Act, North American Waterfowl Management Plan, State Wildlife Action Plans, and other federal and state initiatives. These and other stakeholders would lose the foundational data set that communities of varying interests depend on to reach collaborative

outcomes for effective bird management challenges. Less frequent data collection would undermine the continuous integrity of the long-term time series and reduce the lasting utility of the data set.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On January 7, 2025, we published a 60-Day *Federal Register* notice, (90 FR 1185). We did not receive any comments in response to that notice.

In addition to the *Federal Register* notice, we consulted with the eight (8) organizations identified in Table 8.1 who are familiar with this collection of information to validate our time burden estimates and asked for comments on the questions below:

Table 8.1

Organization	Title
Canadian Wildlife Service Environment and Climate Change Canada 1125 Colonel By Drive, Raven Road Ottawa ON K1A 0H3	U.S. Geological Survey 12100 Beech Forest Road Laurel, MD 20732
U.S. Fish and Wildlife Service 5275 Leesburg Pike, MS-MB Falls Church, VA 22041	California Department of Fish and Wildlife Sacramento, US. 2022-07 to 2024-09
Georgia Department of Natural Resources Wildlife Resources Division 116 Rum Creek Drive Forsyth, GA 31029	West Virginia Department of Natural Res. P.O. Box 67, Ward Road Elkins, WV 26241
Louisiana Department of Wildlife & Fisheries 200 Dulles Drive Lafayette, LA 70506	Pennsylvania Game Commission 2001 Elmerton Ave Harrisburg, PA, 17110

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”

Comments: All responses indicated that the BBS information collection provides information necessary and essential to enabling resource managers to make informed decisions regarding implementation of State Wildlife Action Plans, the North American Waterfowl Management Plan, the Migratory Bird Treaty Act, and other Federal and State initiatives that support bird management and conservation based on sound and objective science. Each also expressed in various ways that BBS data are foundational for effective bird management and conservation nationwide because they are impartial, objective, and provide the longest, most definitive history of changes in North American bird populations.

Agency Response/Action Taken: None needed.

“The accuracy of our estimate of the burden for this collection of information”

Comments: All responses indicated the burden estimate is accurate.

Agency Response/Action Taken: None needed.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: All responses expressed satisfaction with the quality, utility, and clarity of the BBS data collection instrument.

Agency Response/Action Taken: None needed.

“Ways to minimize the burden of the collection of information on respondents”

Comments: A suggestion was offered for future consideration of a mobile-based application to assist in the BBS information collection.

Agency Response/Action Taken: None needed but the BBS program will continue to explore this suggestion.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Certificates are provided to participants upon achieving 10, 20, and 30 years of participation in the BBS program and other milestones. These are provided to recognize participants and express appreciation for the outstanding work they have done for the program over the years.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Personally Identifiable Information of respondents is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). No assurances of confidentiality are provided with regard to bird count data provided. Data in the BBS system is covered by SORN GS-18 Computer Registration System-Interior.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that there will be approximately 2600 responses annually, totaling 28,600 annual burden hours. The average completion time for each information collection is 11 hours.

We estimate the total dollar value of the annual burden hours for this collection to be \$1,339,624. We used the Bureau of Labor Statistics (BLS) news release [USDL-20-0451](#) dated December 17, 2024, “Employer Costs for Employee Compensation – September 2024”, to calculate the total annual burden. BLS reported employee compensation for individuals averaged \$46.84 per hour, including benefits.

Table 12.1

Respondent	Activity	Avg. Time per Response (hours)	Annual No. of Responses	Total Annual Burden Hours*	Hourly Labor Costs Incl. Benefits	Dollar Value of Annual Burden Hours
Individuals	Completes bird survey & submits data	11	2600	28600	\$ 46.84	\$1,339,624

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation, maintenance, and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the Government, or (4) as part of customary and usual business or private practices.

We estimate the total non-hour burden cost to be \$182,000.

a. Total capital and start-up costs: \$0

The BBS relies on individuals highly skilled in avian identification. Most have been avid birders for at least 6 years before being recruited for the BBS. As avid birders they already possess the materials necessary to participate in the BBS.

b. Total operation and maintenance costs: \$182,000.

We used the U.S. General Services Administration (GSA) [Privately Owned Vehicle \(POV\) mileage reimbursement rate](#) effective January 1, 2025, to calculate the total operation and maintenance costs. The GSA POV mileage reimbursement rate is \$0.70.

Table 13.1

Respondent	Activity	Estimated Average Travel per Response (miles)	Annual No. of Responses	Total Annual Travel (miles)	GSA POV Mileage Reimbursement Rate	Total Estimated Operation and Maintenance Value
Individuals	Completes bird survey & submits data	100	2600	260,000	\$0.70	\$182,000

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate the total annual cost to the Federal Government to administer this information collection is \$203,404 (\$164,204 for salary/benefits, Table 14.1; and \$39,200 for printing, postage, and contractor costs, Table 14.2). To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2025-DCB_h](#) to determine the annual salary costs for staff involved in reviewing and processing the information collected as shown below. We used the DOI USGS Budget and Science Information System Plus (BASIS+) to determine the fully burdened hourly rate, which is the cost of employee salary and benefits.

Table 14.1

Position/Grade	Hourly Rate	Fully Burdened Hourly Rate (Incl. Benefits)	Time Spent on Collection (hours)	Total Annual Salary Value
Supervisory Biologist, GS-13/06	\$67.41	\$96.65	320	\$30,928
Biologist, GS-12/01	\$48.59	\$71.50	1040	\$74,360
Biologist, GS-12/01	\$48.59	\$71.50	720	\$51,480
IT Programmer, GS-12/01	\$48.59	\$71.50	104	\$7,436
Total				\$164,204

Table 14.2

Expense Item	Cost Burden
Printing Forms	\$2,000
Postage Costs	\$15,500
Contractor Expenses	\$21,700
Total	\$39,200

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

Changes in the Federal Labor Table (Table 14.1) are due to: (1) reduction in number of burden hours for IT Programmer as result of efficiency gained by systems improvements, (2) replacement of term GS-9/05 term biologist with a permanent GS-12/05 biologist, (3) staff turnover and salary maturation that have affected withing grade step levels.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Trend and relative abundance analyses are conducted annually and presented in an electronic format on the BBS web site (www.pwrc.usgs.gov/bbs/). Tabulated data are also freely available via the web. Summary reports are published in scientific journals at periodic intervals, usually every 2 to 5 years. Presentations are made at scientific conferences as appropriate.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable. We will display the OMB Control Number and expiration date on appropriate materials.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.